

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,
as representative of
THE COMMONWEALTH OF PUERTO RICO *et al.*,
Debtors.¹

PROMESA Title III
No. 17 BK 3283-LTS

(Jointly Administered)

In re:
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,
as representative of
PUERTO RICO ELECTRIC POWER AUTHORITY,
Debtor.

PROMESA Title III
No. 17 BK 4780-LTS

(This court filing relates only to
Case No. 17 BK 4780-LTS)

**INFORMATIVE MOTION OF PUERTO RICO FISCAL AGENCY AND FINANCIAL
ADVISORY AUTHORITY AND PUERTO RICO ELECTRIC POWER AUTHORITY IN
RESPONSE TO ORDER SCHEDULING BRIEFING ON URGENT MOTION TO FILE
UNDER SEAL EXHIBITS TO OMNIBUS REPLY OF OFFICIAL COMMITTEE OF
UNSECURED CREDITORS IN SUPPORT OF URGENT (I) OBJECTIONS TO
MAGISTRATE JUDGE’S AUGUST 2, 2019 ORDER ON MOTION TO COMPEL AND
(II) ALTERNATIVE MOTION TO STRIKE AND TO EXCLUDE OUT-OF-SCOPE
DECLARATION TESTIMONY AND RELATED EVIDENCE [ECF 1606]**

¹ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s Federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

To the Honorable United States District Court Judge Laura Taylor Swain:

The Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF”) and the Puerto Rico Electric Power Authority (“PREPA”)² hereby state and pray as follows:

1. AAFAF and PREPA respectfully submit this informative motion in response to the Court’s *Order Scheduling Briefing on Urgent Motion to File Under Seal Exhibits to Omnibus Reply of Official Committee of Unsecured Creditors in Support of Urgent (I) Objections to Magistrate Judge’s August 2, 2019 Order on Motion to Compel and (II) Alternative Motion to Strike and to Exclude Out-of-Scope Declaration Testimony and Related Evidence*, entered on August 22, 2019 [ECF 1606].

2. AAFAF and PREPA agree to withdraw the confidentiality designation over the specific documents attached to the Omnibus Reply³ as Exhibit W.

3. AAFAF and PREPA do not object to the Committee⁴ publicly filing an unredacted copy of the Omnibus Reply.

² The Financial Oversight and Management Board for Puerto Rico (“Oversight Board”), as PREPA’s representative pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”), has authorized the undersigned to file this Motion on behalf of PREPA.

³ The “Omnibus Reply” is the *Omnibus Reply of Official Committee of Unsecured Creditors in Support of Urgent (I) Objections to Magistrate Judge’s August 2, 2019 Order on Motion to Compel and (II) Alternative Motion to Strike and to Exclude Out-of-Scope Declaration Testimony and Related Evidence* [ECF 1602], which was filed by the Committee on August 20, 2019.

⁴ The “Committee” is the Official Committee of Unsecured Creditors of all Title III Debtors (other than COFINA).

Dated: August 26, 2019
San Juan, Puerto Rico

Respectfully submitted,

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